

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) CIVIL ACTION FILE
- versus -) NO. 1:08-CV-0113-CC
)
\$33,330.00 IN UNITED STATES)
CURRENCY and TEN PIECES OF)
JEWELRY VALUED AT \$27,750.00,)
)
Defendants.)

**CLAIMANT'S MOTION TO EXCEED
TWENTY-FIVE PAGE LIMIT UNDER LOCAL RULE 7.1(d)**

COMES NOW TONY AYOOLA, Claimant in the above-styled matter, and pursuant to Local Rule 7.1(d), files this, his Motion to Exceed the twenty-five page limit specified under said rule in his brief in support of his response to Plaintiff's Motion for Summary Judgment. In support of this motion, Plaintiff shows as follows:

Plaintiff has filed a motion for summary judgment on the claims asserted by Plaintiff, which includes 1,078 pages of attached exhibits, along with a 156 paragraph "Statement of Material Facts," and Claimant cannot adequately respond to Plaintiff's motion within the page limits specified under Local Rule 7.1(D). Claimant shows that the facts underlying the numerous claims asserted by Plaintiff are extensive and detailed. Claimant

further shows that a fair summary of the facts is necessary for a proper consideration of the motion filed by Plaintiff, Claimant's response, and an accompanying Motion to Suppress Claimant anticipates filing.

As such, Claimant respectfully requests that an order issue, permitting him to exceed to the twenty-five page limit in his response to Plaintiff United States' Motion for Summary Judgment. A proposed Order to exceed the twenty-five page limit is attached hereto and marked as Exhibit "A."

Respectfully submitted this 30 day of October, 2009.

/s/ Bruce F. Morrise _____.
Bruce F. Morrise
Attorney for Claimant
Georgia Bar No. 525303

/s/ Daniel Shim _____.
Daniel Shim
Attorney for Claimant
Georgia Bar No. 642749

MORRISS & SHIM, LLC
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(404) 525-8000

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CERTIFICATE OF FONT TYPE, SIZE AND SERVICE

I hereby certify that I have prepared the foregoing "CLAIMANT'S MOTION TO EXCEED TWENTY-FIVE PAGE LIMIT UNDER LOCAL RULE 7.1(d)" compliance with Local Rule 5.1, using Times New Roman 14 point type, and have this day electronically filed the same with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Michael Brown, Esq.
Assistant U.S. Attorney
Suite 600
75 Spring Street, S.W.
Atlanta, GA 30303

This 30th day of October, 2009.

/s/ Daniel Shim

Daniel Shim

Georgia Bar No. 642749

Attorney for Claimant

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PROPOSED ORDER

Having read and considered the Plaintiff's "Motion to Exceed Twenty-Five Page Limit Under Local Rule 7.1(d)," and for good cause shown, the Motion is hereby **GRANTED**.

SO ORDERED this _____ day of _____, 2009.

The Honorable Clarence E. Cooper
Judge, U.S. District Court
Northern District of Georgia